

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

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THE COALITION TO PROTEST THE )  
DEMOCRATIC NATIONAL )  
CONVENTION, ET AL )

Plaintiffs )

v. )

Civil Action No. 04-11608-DPW

THE CITY OF BOSTON, RICHARD )  
LORING, ANDREA D'AMATO, )  
PATRICIA MALONE, )

Defendants )  
\_\_\_\_\_

AFFIDAVIT OF PAUL BURKE

I, Paul Burke do hereby declare:

1. I make this affidavit based upon personal knowledge
2. I am a City of Boston firefighter with the rank of Chief. I have been a firefighter for thirty years.
3. I am in charge of the Fire Investigative Unit for the City of Boston Fire Department.
4. I was asked by the City of Boston Law Department how much space fire apparatus would need to operate on a city street.
5. An engine company fire truck is approximately twenty-eight feet wide and would need approximately another ten to twelve feet or a total of thirty-eight to forty feet of space to operate in order for the firefighters to be able to go around the truck and use the hoses and ground ladders.
6. A ladder fire truck is approximately forty feet wide and would need approximately another thirty-five feet for a total of seventy-five feet to operate in order for the firefighters to be able to maneuver around the ground and access the ground ladders and the jacks and the cabinets.
7. The security fence on Causeway Street has severely limited access for all fire apparatus as it has created dead end streets in the Soft Zone. Any further restrictions on space in Causeway Street will impede the ability of the fire trucks to access the area in Causeway Street and operate their apparatus

Signed under the pains and penalties of perjury this twenty-first day of July, 2004

\_\_\_\_/s/ Paul Burke\_\_\_\_\_

Paul Burke  
Chief  
City of Boston Fire Department